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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

In the Matter of )

Establishment of Rules and Policies for the )  
Digital Audio Radio Satellite Service in the )  
2310-2360 MHz Frequency Band )

IB Docket No. 95-91  
Gen Docket No. 90-357

To the International Bureau:

**REPLY COMMENTS OF MCI WORLDCOM, INC.**

MCI WorldCom, Inc. (MCI WorldCom) hereby submits its Reply Comments in response to the Federal Communications Commission's (the Commission) January 21, 2000 *Public Notice*<sup>1</sup> addressing XM Radio Inc.'s (XM) and Sirius Satellite Radio Inc.'s (SSR) supplemental filings. MCI WorldCom strongly supports the comments filed by BellSouth Corporation and the Wireless Communications Association International, Inc. (WCA). In order to protect licensees in the Multichannel Multipoint Distribution Service (MMDS), Instructional Television Fixed Service (ITFS) and Wireless Communications Service (WCS) from any adverse affects, more stringent restrictions must be placed on the terrestrial Digital Audio Radio Service (DARS ) operations that are being proposed by XM and SSR.<sup>2</sup>

XM and SSR's supplemental filings propose minimal restrictions regarding their deployment of high-power terrestrial transmission facilities throughout the United States. So minimal, in fact, that the proposals fail to provide sufficient protection for

<sup>1</sup> See Satellite Policy Branch Information, *Public Notice* (rel. Jan. 21, 2000).

<sup>2</sup> MCI WorldCom is an MMDS and WCS licensee, with MMDS licenses covering a substantial portion of the United States and WCS licenses in many markets including Dallas, TX, Jackson, MS and Memphis, TN, which would be adversely affected by the operations that are being proposed by XM and SSR. Accordingly, MCI WorldCom has a compelling interest in ensuring that more stringent restrictions are placed on the operation of terrestrial DARS repeaters than those proposed by XM and SSR.

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MMDS/ITFS and WCS licensees from harmful electrical interference from terrestrial DARS.

As SSR concedes in its supplemental filing that terrestrial DARS operations “would be likely to cause overload of the MDS downconverters” at receivers located within 2048 meters of a terrestrial repeater.<sup>3</sup> The Commission addressed this type of interference before in adopting the Part 27 rules, which govern WCS, and determined that unrestricted WCS terrestrial operations could interfere with MMDS/ITFS operations.<sup>4</sup> Accordingly, the Commission adopted a series of power limits, notice requirements and equipment replacement rules, to reduce WCS terrestrial operations threat of interference with MMDS/ITFS operations. The Commission should impose similar restrictions on terrestrial DARS transmitter operations in the 2320-2345 MHz band.

Specifically, in order to protect the operations of MMDS/ITFS operations, the Commission should: (1) restrict terrestrial DARS repeaters to 400 watts/MHz peak equivalent isotropically radiated power (EIRP) (which is the same 2000 watts peak EIRP limit that the Commission imposed on WCS fixed operations, adjusted to reflect the bandwidth differences); (2) require DARS licensees to notify nearby MMDS/ITFS licensees before commencing terrestrial operations; and (3) require DARS licensees to replace MMDS/ITFS downconverters consistent with the same obligations of WCS licensees. Finally, in order to protect WCS licensees from potential harmful interference from terrestrial DARS facilities out-of-band emissions, the Commission should adopt BellSouth’s proposal to require terrestrial DARS out-of-band emissions to be attenuated at an additional 14db beyond the attenuation proposed by XM and SSR.

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<sup>3</sup> See SSR Supplement at Exhibit 2, p. 9-10.

In conclusion, MCI WorldCom strongly supports the comments submitted by BellSouth and WCA, and urges the Commission to protect MMDS/ITFS and WCS licensees from harmful electrical interference by adopting more stringent restrictions on terrestrial DARS operations than those proposed by XM and SSR.

Respectfully submitted,

MCI WORLDCOM, INC.

By:   
Robert S. Koppel  
Jennifer A. Manner  
M. Lillie Harrison  
MCI WorldCom, Inc.  
1133 19<sup>th</sup> Street, N.W.  
Washington, D.C. 20036  
(202) 736-6006

March 8, 2000

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<sup>4</sup> See Amendment of the Commission's Rules to Establish Part 27, the Wireless Communications Service ("WCS"), 12 FCC Rcd. 3977 (1977).

Certificate of Service

I, Johanna L. Jones, hereby certify that the foregoing Reply Comments were served this 8<sup>th</sup> day of March, 2000, by depositing a true copy thereof with the United States Postal Service, first-class postage prepaid, addressed to the parties listed on the attached list unless otherwise noted:

Stephen J. Berman  
Bruce D. Jacobs  
David Konzcal  
Fisher Wayland Cooper  
Leader & Zaragoza, LLP  
2001 Pennsylvania Avenue, NW  
Suite 400  
Washington, DC 20006

Lon C. Levin  
Senior Vice President, Regulatory  
XM Satellite Radio Inc.  
10802 Park Ridge Boulevard  
Reston, VA 20191

Richard E. Wiley  
Paul E. Misener  
Carl R. Frank  
Jennifer D. Wheatley  
Wiley, Rein & Fielding  
1776 K Street, NW  
Washington, DC 20006

Gary Klein  
Ralph Justus  
George Hanover  
The Consumers Electronics  
Manufacturers Association  
2500 Wilson Blvd.  
Arlington, VA 22201

M. Scott Johnson, Esquire  
Anne M. Stamper, Esquire  
Gardner, Carton & Douglas  
1301 K Street, N.W., East Tower #900  
Washington, DC 20005

Paul J. Sinderbrand  
William W. Huber  
Wilkinson Barker Knauer, LLP  
2300 N Street, NW  
Suite 700  
Washington, DC 20037

Catherine Wang  
William B. Wilhelm, Jr.  
Swidler & Berlin, Chartered  
3000 K Street, NW, Suite 300  
Washington, DC 20007

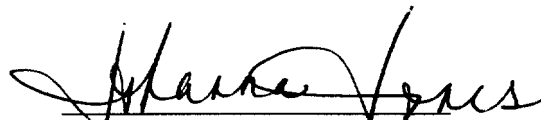
Charles T. Morgan, Sr. Vice President  
Susquehanna Radio Corp.  
140 East Mark Street Corp.  
York, PA 17401

Henry L. Baumann  
Valerie Schulte  
National Association of Broadcasters  
1771 N Street, NW  
Washington, D.C. 20006

Robert B. Jacobi  
Cohn and Marks  
1333 New Hampshire Ave., NW, #600  
Washington, D.C. 20036-1573

William B. Barfield  
Thompson T. Rawls, II  
BellSouth Corporation and  
BellSouth Wireless Cable, Inc.  
Suite 1800  
1155 Peachtree Street, NE  
Atlanta, GA 30309

Cheryl Tritt, Esq.  
Morrison & Forester  
2000 Pennsylvania Ave., Suite 5500  
Washington, DC 20006



Johanna L. Jones